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October 31, 2002

Mr. Rodney Struck  
Oregon Department of Environmental Quality  
2020 SW 4th Avenue, Suite 400  
Portland, Oregon 97201

**Subject: Terminal 1 South, Parcel 2 (Area B)  
Final Removal Action Report  
Response to Review Comments on Removal Action Report  
ECSI File No. 2642**

Dear Mr. Struck:

The Port of Portland (Port) has prepared the following responses to the Oregon Department of Environmental Quality (DEQ) review comments on the Terminal 1 South (T1S), Parcel 2 (Area B) Removal Action Report, as documented in your letter dated October 25, 2002. The Port revised the Removal Action Report per the Port's response to DEQ's comments (repeated below) summarized below. The Removal Action report documents cleanup activities completed for closure of Parcel 2 (Area B) of the site. The report includes a description of the removal activities and conformation sampling results, as well as a residual risk assessment utilizing an urban residential exposure scenario. Two copies of the T1S Removal Action Report are submitted to DEQ for approval.

**General Comments**

- A. The report consistently refers to the cleanup levels for soils [for] the construction worker scenario as applying to soils 0-10 feet below ground surface (bgs). The construction worker scenario applies to soils from 3 to 15 feet bgs.

**Response:** The baseline risk for the construction worker was acceptable for Parcel 2. Therefore, any references to construction worker in the removal action report were unintended. These references to the construction worker have been removed.

- B. Tables. Revise applicable depth for construction scenario to apply to 3-15 feet bgs.

**Response:** See response to Comment A.

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- C. The report should contain a conclusion section. This section should state whether or not the removal action meets the cleanup levels set in the Record of Decision and the proposed ROD amendment and the results of the residual risk assessment.

**Response:** A new Section 8 has been added to the report that bullets the conclusions of the baseline risk assessment, feasibility study, the record of decision (ROD), ROD amendment, soil removal, confirmation sampling, residual risk assessment, and recommendation for no further action.

**Specific Comments**

1. Page 1. Executive Summary. Paragraph 4. Please revise the last sentence to read

*"...PAH cleanup levels under the urban residential exposure scenario were calculated using exposure parameters provided by DEQ. Based on these calculations, DEQ is preparing an amendment to the Record of Decision (ROD) to revise the cleanup levels for shallow (0 to 3 feet bgs) soil. The proposed amendment will be made available for public review and comment."*

**Response:** This change was made.

2. Page 2. Executive Summary. Last Paragraph. It should be clarified that "no further action" is recommended following recording of the deed restrictions are required by the ROD.

**Response:** This change was made.

3. Page 8. Section 3.5. Paragraph 2. Please revise this paragraph as requested in Specific Comment No. 1.

**Response:** This change was made.

4. Page 12. Section 5.5. Please provide information documenting the sand from the borrow site meets the T1S cleanup levels.

**Response:** Section 5.5 was revised to indicate that the borrow source is a clean fill stockpile Columbia River dredge sand.

5. Page 12. Section 6.0. The sample depths, 0-3 ft and 3-10 feet should be explained. Are these composite samples? If so how were they composited? Are they discrete samples? How was the sample collected and what was the depth?

**Response:** The depth interval was inadvertently used for the sample depth. All confirmation samples were discrete samples and the actual sample depth has been identified in the tables.

6. Page 14. Section 6.2.1. It is unclear how Construction worker cleanup concentrations were achieved in the vicinity of the following borings: B-63, B-65, and B-92. Please provide additional information. See also General Comment C.

**Response:** See response to General Comment A. The concentrations from these borings were included in the baseline risk assessment and the risk to the construction worker is acceptable.

7. Page 16. Section 7. The removal report must include qualitatively or quantitatively evaluate residual risk for soil between 3 and 15 feet bgs on Parcel 2. The report should state why the excavations on Parcel 2 were limited to 10 feet.

**Response:** See response to General Comment A. The excavation depth of 10 feet was based on addressing TPH soil for future construction. This has been clarified in Section 3.4.

8. Page 17. Section 7. Paragraph 1. Please revise this paragraph as requested in Specific Comment No. 1. Please discuss the estimated risk to human health for each soil unit (e.g., 0-3 and 3-15 feet bgs). The report should clearly define the soil depths used to calculate risk for the urban residential, commercial, and construction worker scenarios and the estimated risk for each zone.

**Response:** This change was made. Only the urban resident was evaluated in the residual risk assessment because all other baseline risks were acceptable. This has been clarified in Section 7.

9. Table 1. The TPH cleanup level for the residential scenario is 750 mg/kg. No TPH cleanup level was set in the ROD for the Construction Worker scenario.

**Response:** This change was made. The tables were also revised to remove references to the construction worker scenario.

10. Table 3.

- Area 1. A footnote should be added to explain why samples were collected from 5-6 feet.
- General. The depth of the bottom samples should be specified.
- General. A footnote should be added to indicate what the samples labeled (3-10) feet represent. Are these discrete samples or composites?

**Response:** The table was revised.

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Please contact me at (503) 944-7533 with any questions. Your prompt attention is appreciated.

Sincerely,



Joe Mollusky  
Environmental Project Manager  
Properties and Development Services

Attachment

cc: Bill Bach, Port (w/o attachment)  
Jeff Bachrach, Ramis Crew Corrigan & Bachrach  
Herb Clough, Hart Crowser (w/o attachment)  
Nancy Murray, Port (w/o attachment)  
Tim Ralston, Ralston Investments  
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